

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

K.C., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 1:23-cv-00595-JPH-KMB
	)	
THE INDIVIDUAL MEMBERS OF THE	)	
MEDICAL LICENSING BOARD OF	)	
INDIANA, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**Plaintiffs' Preliminary Witness and Exhibit Lists**

Plaintiffs, by their counsel, submit their preliminary witness and exhibit lists.

*Preliminary Witness List*

1. Nathaniel and Beth Clawson and K.C., who may be contacted in care of their counsel.
2. Ryan and Lisa Welch and M.W., who may be contacted in care of their counsel.
3. Emily Morris and A.M., who may be contacted in care of their counsel.
4. Maria Rivera and M.R., who may be contacted in care of their counsel.
5. Catherine Bast, M.D., who may be contacted in care of her counsel.
6. Mixhi Marquis, c/o Mosaic Health and Healing Arts. Inc., who may be contacted in care of counsel.

7. The Individual Members of the Medical Licensing Board of Indiana, or their designees, who may be contacted in care of defendants' counsel.

8. The Attorney General of the State of Indiana, or his designees, who may be contacted in care of defendants' counsel.

9. The Executive Director of the Indiana Professional Licensing Agency, or her designees, who may be contacted in care of defendants' counsel.

10. The Secretary of the Indiana Family and Social Services Administration, or his designees, who may be contacted in care of defendants' counsel.

11. The Indiana Family and Social Services Administration, or the agency's designees, which can be contacted in care of defendants' counsel.

12. Expert disclosures are governed by paragraphs IV(F) and IV(G) of the approved Case Management Plan in this case. (Dkt. 84). However, as a courtesy to opposing counsel, Plaintiffs make the following disclosures as to expert witnesses who have discoverable information that may be used to support their claims. Plaintiffs reserve the right to call additional expert witnesses.

- a. Dan Karasic, M.D., Professor Emeritus, University of California, San Francisco School of Medicine, San Francisco, CA, who may be contacted in care of undersigned counsel.

- b. Daniel Shumer, M.D., Michigan Comprehensive Gender Services Program, Michigan Medicine, Ann Arbor, Michigan, who may be contacted in care of undersigned counsel.
  - c. Jack Turban, M.D., University of California, San Francisco School of Medicine, San Francisco, CA, who may be contacted in care of undersigned counsel.
- 13. Janine Fogel, M.D., Eskenazi Women's Center of Excellence.
  - 14. Elaine Cox, M.D., Riley Children's Hospital.
  - 15. As of yet unknown health professionals at the Riley Gender Health Program.
  - 16. LaRisha Hanks
  - 17. Jamie Harris
  - 18. Julia Kathary
  - 19. Patrick Rhodes
  - 20. Michael Rabinowitch and Lindsey Rabinowitch
  - 21. Krisztina Inskeep
  - 22. Christine Paulsen
  - 23. Emma Vosicky
  - 24. As of yet unidentified future persons whose declarations may be used to support the class certification motion.
  - 25. As of yet unidentified members of the putative classes and/or subclasses.
  - 26. All persons listed on defendants' initial disclosures and any future witness lists.

27. All persons necessary for impeachment or rebuttal purposes.

28. Defendants will be notified of additional persons in a timely fashion as these persons become known.

*Documents that may be used to support plaintiffs' claims*

1. All documents attached to any filings by plaintiffs or defendants in this case.

2. All documents produced by the defendants in this case.

3. All reports or sworn statements of plaintiffs' expert witnesses and defendants' putative expert witnesses produced in this case, and the materials those experts cited or relied upon.

4. All depositions taken in this matter and their exhibits.

5. All responses to interrogatories and documents produced in discovery in this matter, whether by the parties or third parties.

6. All stipulations and responses to requests for admissions in this matter.

7. The complaint and answer to the complaint in this case and any amended complaints and answers to any amended complaints.

8. All affidavits, declarations, and other verified documents filed in this case.

9. All documents noted by defendants in their disclosures and all exhibit lists.

10. Any and all documents necessary for impeachment or rebuttal.

11. Publicly available documents.

12. Plaintiffs may also rely on documents that are identified as discovery progresses and additional investigation is completed.

13. The defendants will be notified of any additional documents in a timely fashion.

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